

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)

v.)

WILLIAM JOSEPH STUART,)

Defendant.)

Criminal No. 1:13-CR-317

STATEMENT OF FACTS

The United States and the defendant, William Joseph Stuart, agree that had this matter proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt:

1. The defendant, William Joseph Stuart ("Stuart"), was a 51 year-old President of the Remington Volunteer Fire & Rescue Department ("RVFD"), who resided in Bealton, Virginia, within the Eastern District of Virginia.

2. At all times relevant to this matter, the RVFD was an organization and local government agency of the Fauquier County, Virginia government located in Fauquier County, Virginia, within the Eastern District of Virginia.

3. During the one-year periods beginning on or about September 1, 2008 and September 1, 2009, both the RVFD and the Fauquier County, Virginia government each received federal assistance in excess of \$10,000, including, but not limited to a Federal grant from the U.S. Department of Agriculture in the approximate amount of \$3 million.



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4. During the period from on or about September 2008 to on or about April 2009, the defendant, as President of the RVFD, had signature authority on numerous financial accounts in the name of RVFD at various financial institutions. During this period, the defendant was further in charge of purchasing office equipment, furniture and electronics to outfit a newly renovated Fire Station for the RVFD.

5. At or about the end of 2008, Stuart was laid off from his job as a credit manager at a used car dealership. Beginning in or about September 2008, the defendant began converting RVFD funds for personal use by submitting several false and fraudulent invoices to the RVFD for reimbursement of material goods that the defendant falsely claimed to have purchased on behalf of RVFD.

6. Between on or about September 1, 2008 and on or about April 30, 2009, Stuart did steal funds belonging to RVFD by various means, including writing checks to himself based upon the fraudulent invoices and documentation that Stuart created.

7. During this period, defendant Stuart submitted false and fraudulent invoices to the RVFD to claim reimbursements for expenditures that had not been made by him. As part of the scheme, Stuart submitted an invoice for a company that did not exist. In some instances, Stuart did not submit any invoices for checks he wrote to himself.

8. The majority of the checks written to Stuart were signed by Stuart and one other RVFD Officer. On or about the following dates, Stuart did steal a total of approximately

\$40,000 from RVFD bank accounts in approximately the following amounts consistent with the means described in the paragraphs referenced above:

<u>Date</u>	<u>Amount of Theft</u>
September 13, 2008	\$ 4,583
October 17, 2008	\$ 4,351
November 12, 2008	\$ 5,972
November 22, 2008	\$ 4,800
December 13, 2008	\$ 4,300
January 4, 2009	\$ 5,300
February 5, 2009	\$ 2,865
February 20, 2009	\$ 3,410
March 21, 2009	\$ 3,400
<u>April 10, 2009</u>	<u>\$ 1,151</u>
Total	\$40,132

9. At all relevant times, the actions of the defendant, William Joseph Stuart, as recounted above were in all respects knowing, deliberate, and willful, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,


Neil H. MacBride
United States Attorney

By:  8/27/2013

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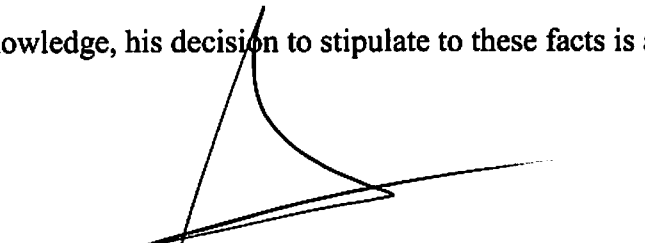
Defendant's Stipulation and Signature: After consulting with my attorneys and pursuant to the plea agreement I entered into this day with the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proven the same beyond a reasonable doubt.

Date: 8/25/2013


William Joseph Stuart,
Defendant

Defense Counsel's Signature: I have carefully reviewed the above statement of facts with my client, William Joseph Stuart. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 8/27/13


Jorge E. Artieda
Counsel for the Defendant